

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 13-10017-JLT
)	
ALEXIS HIDALGO, <i>et al</i> ,)	
Defendants.)	

UNITED STATES' SECOND BILL OF PARTICULARS FOR FORFEITURE OF ASSETS

The United States of America, by and through its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby files the following Second Bill of Particulars for Forfeiture of Assets.

On January 16, 2013, a federal grand jury sitting in the District of Massachusetts returned a ten-count Indictment charging thirty defendants with Conspiracy to Distribute Cocaine Base, Cocaine, Oxycodone and Marijuana, in violation of 21 U.S.C. § 846 (Count One); Distribution of Marijuana, Cocaine Base, and Oxycodone, in violation of 21 U.S.C. § 841(a)(1) (Counts Two through Nine); Felon in Possession of a Firearm and Ammunition, in violation of 18 U.S.C. § 922(g)(1) (Count Ten); and Aiding and Abetting, in violation of 18 U.S.C. § 2.

The Indictment also contained two Forfeiture Allegations. The first forfeiture allegation (the Drug Forfeiture Allegation) gave the defendants notice that the United States sought forfeiture, pursuant to 21 U.S.C. § 853, upon conviction of one or more of the offenses alleged in Counts One through Nine of the Indictment, of any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations, including but not limited to the following:

- a. \$18,800 in United States currency seized on or about August 24, 2012 from Jonathan DaSilva in Boston, Massachusetts.

The second forfeiture allegation (the Gun Forfeiture Allegation) gave the defendants notice that the United States sought forfeiture pursuant to 18 U.S.C. § 924(c) and 28 U.S.C. § 2461(c), upon conviction of the offense alleged in Count Ten of the Indictment, of all firearms and ammunition involved in such violation, including but not limited to the following:

- a. a Ruger P89 semiautomatic handgun bearing serial number 314-79400 and containing 10 rounds of 9 millimeter ammunition.

On April 2, 2013, the United States filed a Bill of Particulars giving notice that it is seeking forfeiture of additional specific properties pursuant to 21 U.S.C. § 853. *See* Docket No. 392.

Pursuant to, and without limiting in any manner the Forfeiture Allegations of the Indictment or the Bill of Particulars filed on April 2, 2013, the United States hereby gives notice that it is further seeking forfeiture of, without limitation, the following specific properties pursuant to 21 U.S.C. § 853:

- a. \$8,756 in United States currency seized on or about January 17, 2013 from Broadway in Malden, Massachusetts;
- b. various pieces of jewelry seized on or about January 17, 2013 from Broadway in Malden, Massachusetts;
- c. \$3,929 in United States currency seized on or about January 17, 2013 from Kennedy Drive in Malden, Massachusetts;
- d. various pieces of jewelry seized on or about January 17, 2013 from Kennedy Drive in Malden, Massachusetts;
- e. \$31,138 in United States currency seized on or about January 17, 2013 from Langdon Street in Roxbury, Massachusetts; and
- f. one black 2010 Audi A4 sedan with Vehicle Identification Number WAUFFAFL0AN03246 and bearing Massachusetts Registration 3HA-A40, seized on or about January 17, 2013.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Mary B. Murrane
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Dated: May 23, 2013

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Electronic Court Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Mary B. Murrane
MARY B. MURRANE
Assistant U.S. Attorney

Dated: May 23, 2013